

Response to Productivity Commission Disability Care and Support Draft Report

The Commission is to be congratulated on the preparation of an excellent report.

Key comments

- It is a great relief to see that the report asserts that the level and mode (budget and parliamentary cycles) of funding have been totally inadequate.
- The need for an NDIS is well demonstrated by the level of unmet demand.
- It is important to make sure that States rights issues do not torpedo further work on fine-tuning the detail.
- Equally, much about the current system is solid and worthwhile: 'the baby should not be thrown out with the bathwater'.
- The current Western Australian system should be maintained and used to distribute additional NDIS funding. This approach should be seen as a 'pilot', to be studied and compared to outcomes achieved by other jurisdictions utilizing the proposals in the draft report.
- The commercial focus within a NDIS should be an equal partner to common sense and principled, well-informed decision making.
- Similarly, self-directed funding is important but should not eclipse the importance of balance and choice in models of support available.

A majority of people currently using specialist disability supports are people with cognitive impairments like intellectual disability. These people need much more than simply 'a good relationship' with a carer in order to achieve positive outcomes in their lives and to avoid the pitfalls of episodes of 'challenging behaviour'. Remuneration for this level of skilled care and support ought to be recognized. For example, a person with severe intellectual disabilities and serious challenging behaviour needs support from someone who not only has a good relationship with them, but who knows how to manage everyday situations so as not to trigger episodes of challenging behaviour. Additionally, understanding the implications of intellectual disability on general health care management and basic communication will generally require more training and skill.

In response to information sought

The Commission seeks feedback about whether Carer Payment, Carer Supplement, Carer Allowance, Mobility Allowance, and the Child Disability Assistance Payment should fall within the scope of the NDIS.

The NDIS has enough complexity without adding further complication by including these payments within its scope.

The Commission considers that needs assessments should take account of the extent of natural supports, and that the NDIS should waive the front-end deductible where the value of this support exceeds some government determined level.

Natural supports can 'fall over' very quickly and can easily be overstated/overestimated, therefore, they should form only a small part of any assessment. Front-end payments, and loyalty discounts have no place in the serious business of specialist disability support.

The Commission seeks feedback on whether these tools, or any other assessment tools, would be appropriate for assessing the care and support needs of individuals having regard for:

- *the role of the assessment process in the context of an NDIS*
- *the desirable traits as outlined in section 5.4.*

Potential specialist disability service users have a mountain of assessment/treatment documentation generated by a range of professional practitioners. Use this information. These professionals should play a significant role in assessment and eligibility processes.

Perhaps NDIS could establish a practitioner accreditation process.

It is worth noting that development of a single, universal assessment instrument has a failed history within the disability community. Most recently, the National Disability Administrator group, despite a very large investment of resources, failed to deliver anything in relation to its National Resource Allocation and Assessment tool initiative.

Di Shepherd

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